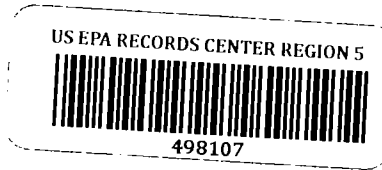




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF: *Liz*

CS-3T

*Original
date stamped
4/28/93*

Ms. Linda Bullen
McDermott, Will & Emery
227 W. Monroe Street
Chicago, Illinois 60606-5096

Ms. Risa Weinstock
North American Philips Corporation
100 E. 42nd Street
New York, New York 10017

Re: United States v. The Selmer Company, et al.
Civil Action No. S89-00348

Dear Linda and Risa:

Enclosed for your clients' signatures is the final Consent Decree. I am transmitting the Decree and Work Plan to each of you so as to save time, and plan to combine the signature pages when you return the signed documents to me. At that point, I will send the documents to EPA's Regional Administrator for his signature and then to the Department of Justice. Once all parties have executed the Decree, Frank will send copies of the signature pages to each of us.

The Appendix 1 being sent to you is just a copy of the bound, final Work Plan that was sent to me on April 21, 1993. The original will be filed with the original Decree in District Court.

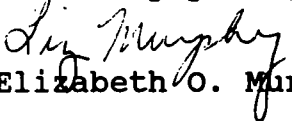
Several minor changes have been made to this final Consent Decree. They are as follows:

- o Caption -- added "Chief Judge Sharp"
- o ¶ 38: capitalized all references to "Defendants"
- o ¶ 52.b.: deleted one of the two "to EPA" phrases regarding submittal of a Phase I draft technical memorandum
- o ¶ 78: added defendants' representatives for notices signature blocks at the end: added names and addresses, as well as a block for identifying agents to accept service of process.

Please have your clients return their signed Consent Decree to me
at:

U.S. EPA, Region V
77 West Jackson Blvd.
CS-3T
Chicago, Illinois 60604-3590

Sincerely yours,


Elizabeth O. Murphy

cc: F. Bentkover, DOJ
K. Theisen, HSE3-5J